

**OFFICE OF RIVER PROTECTION POSITION ON  
CONTRACTOR-INITIATED  
CHANGES TO THE AUTHORIZATION BASIS**



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As directed by Congress in Section 3139 of the *Strom Thurmond National Defense Authorization Act for Fiscal Year 1999*, the U.S. Department of Energy (DOE) established the Office of River Protection (ORP) at the Hanford Site to manage the River Protection Project (RPP), formerly known as the Tank Waste Remediation System. ORP is responsible for the safe storage, retrieval, treatment, and disposal of the high level nuclear waste stored in the 177 underground tanks at Hanford.

The initial concept for treatment and disposal of the high level wastes at Hanford was to use private industry to design, construct, and operate a Waste Treatment Plant (WTP) to process the waste. The concept was for DOE to enter into a fixed-price contract for the Contractor to build and operate a facility to treat the waste according to DOE specifications. In 1996, DOE selected two contractors to begin design of a WTP to accomplish this mission. In 1998, one of the contractors was eliminated, and design of the WTP was continued. However, in May 2000, DOE chose to terminate the privatization contract and seek new bidders under a different contract strategy. In December 2000, a team led by Bechtel National, Inc. was selected to continue design of the WTP and to subsequently build and commission the WTP.

On January 10, 2001, the U.S. Department of Energy published the revised Nuclear Safety Management rule, 10 CFR 830. This rule, in Subpart B, "Safety Basis Requirements," established specific requirements for the establishment and maintenance of the safety basis of DOE nuclear facilities, including the River Protection Project Waste Treatment Plant (RPP-WTP) project.

A key element of the River Protection Project Waste Treatment Plant (RPP-WTP) is DOE regulation of safety. The regulation is authorized by the document entitled *Policy for Radiological, Nuclear, and Process Safety Regulation of the River Protection Project Waste Treatment Plant Contractor* (DOE/RL-96-25) (referred to as the Policy) and implemented through the document entitled *Memorandum of Agreement for the Execution of Radiological, Nuclear, Process Safety Regulation of the RPP-WTP Contractor* (DOE/RL-96-26) (referred to as the MOA). These two documents provide the basis for the safety regulation of the RPP-WTP at Hanford, including the implementation of regulatory requirements such as 10 CFR 830.

The foundation of both the Policy and the MOA is that the mission of removal and immobilization of the existing large quantities of tank waste by the RPP-WTP Contractor must be accomplished safely, effectively, and efficiently.

The Policy maintains the essential elements of the regulatory program established by DOE in 1996 for the privatization contracts. The MOA clarifies the DOE organizational relationships and responsibilities for safety regulation of the RPP-WTP. The MOA provides a basis for key DOE officials to commit to teamwork in implementing the policy and achieve adequate safety of RPP-WTP activities.

The Policy, the MOA, the RPP-WTP Contract, and the four documents incorporated in the Contract define the essential elements of the regulatory program being executed by the ORP. The four documents incorporated into the Contract (and also in the MOA) are as follows:

*Concept of the DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor*, DOE-96-0005,

*DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor*, DOE/RL-96-0003,

*Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*, DOE/RL-96-0006, and

*Process for Establishing a Set of Radiological, Nuclear, and Process Safety Standards and Requirements for the RPP Waste Treatment Plant Contractor*, DOE/RL-96-0004.

DOE patterned its safety regulation of the RPP-WTP Contractor to be consistent with the concepts and principles of good regulation (reliability, clarity, openness, efficiency, and independence) used by the Nuclear Regulatory Commission (NRC). In addition, the DOE principles of integrated safety management were built into the regulatory program for design, construction, operation, and deactivation of the facility. The regulatory program for nuclear safety permits waste treatment services to occur on a timely, predictable, and stable basis, with attention to safety consistent with that which would occur from safety regulation by an external agency. DOE established a dedicated regulatory organization to be a single point of DOE contact for nuclear safety oversight and approvals for the WTP Contractor. This organization performs nuclear safety review, approval, inspection, and verification activities for ORP using the NRC principles of good regulation while defining how the Contractor shall implement the principles of standards-based integrated safety management.

A key feature of this regulatory process is its definition of how the standards-based integrated safety management principles are implemented to develop a necessary and sufficient set of standards and requirements for the design, construction, operation, and deactivation of the RPP-WTP facility. This process meets the expectations of the DOE necessary and sufficient closure process (subsequently renamed Work Smart Standards process) in DOE Policy 450.3, *Authorizing Use of the Necessary and Sufficient Process for Standards-based Environment, Safety and Health Management*, and is intended to be a DOE approved process under DOE Acquisition Regulations, DEAR 970.5204-2, *Laws, Regulations and DOE Directives*, Section (c). DOE approval of the contractor-derived standards is assigned to the Manager, Office of River Protection.

The RPP-WTP Contractor has direct responsibility for WTP safety. DOE requires the Contractor to integrate safety into work planning and execution. This integrated safety management process emphasizes that the Contractor's direct responsibility for ensuring that safety is an integral part of mission accomplishment. DOE, through its safety regulation and management program, verifies that the Contractor achieves adequate safety by complying with approved safety requirements.

## **RECORD OF REVISION**

**Document Title:** ORP Position on Contractor-initiated Changes to the AB

**Document Number:** RL/REG-97-13

<b>Revision Date</b>	<b>Revision Number</b>	<b>Reason for Revision</b>
11/24/97	0	Original issue.
11/24/97	1	Fixed typographical errors. Added reference to applicable DOE regulations with regard to processing Changes to the Radiation Protection Program and Quality Assurance Program.
12/05/97	2	Fixed typographical errors
03/31/98	3	<p>An endnote was included in the “Authorization Basis” definition to clarify that documents included in the authorization basis may be superceded by documents in subsequent regulatory submittals.</p> <p>The definition of “Changes” was clarified. The definition was modified and an endnote was added to clarify that Changes that might affect information or commitments made in the authorization basis, but are not explicitly identified in the authorization basis, need to be checked for consistency with authorization basis.</p> <p>Clarified that “safety triad” conformance certification is required for Changes made to the SRD, not the SRD in its entirety.</p>
09/15/98	4	The definition of “Authorization Basis” was modified. Included a statement indicating that the Authorization Basis includes that information requested by Contractor for inclusion in the Authorization Basis and subsequently accepted by the RU.
04/15/99	5	The paper was reformatted and converted to MS Word – No Changes made to RU positions.
04/11/00	6	<p>Made Changes to allow implementation of the contractor’s “proceed-at-risk” authorization basis maintenance proposal (ref: 00-RU-0257).</p> <p>Added new position regarding the content of safety evaluations.</p>
07/20/00	7	<p>Incorporated Contractor editorial comments on Revision 6 (Ref: 00-RU-0257).</p> <p>Revised definition of “USQ” to conform to Revision 1 of governing documents glossary.</p>
3/8/02	8	Changes to split apart facility, administrative control and SRD changes , and provide criteria for facility change threshold during construction.
9/6/02	9	Changes to the Authorization Basis must be updated annually for administrative controls changes and to

		facility changes of low safety significance. The Contractor may now make all changes to the administrative controls described in the Authorization Basis without prior DOE approval, with certain conditions. Revised Title to reflect ORP. Updated Contractor-suggested definitions
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## **OFFICE OF RIVER PROTECTION POSITION ON CONTRACTOR-INITIATED CHANGES TO THE AUTHORIZATION BASIS**

### **1.0 INTRODUCTION**

The U. S. Department of Energy (DOE), Office of River Protection (ORP) positions described in this document are not requirements. These positions describe methods acceptable to the ORP for evaluating and implementing Contractor-initiated changes to the authorization basis. In particular, the River Protection Project Waste Treatment Plant (RPP-WTP) Contractor has the responsibility to establish an appropriate standard for evaluating and implementing Contractor-initiated changes in the Safety Requirements Document (SRD). The process for performing such changes is expected to be detailed in the Integrated Safety Management Plan. Conformance with the positions described in this document does not alter the Contractor's responsibility for ensuring that standards established or identified in the SRD will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

The RPP-WTP regulatory process involves multiple steps of Contractor submittals and specific regulatory actions. Contractor submittals provide the information and commitments that serve as the basis for regulatory decisions taken by the ORP in connection with regulatory actions and establish the authorization basis. The existence of an authorization basis started with Standards Approval, which was the first regulatory action.

The authorization basis is not just relevant to specific ORP decisions but also serves several functions following the completion of a specific regulatory action. The authorization basis describes the safety basis for the facility and is the benchmark used to evaluate the safety implications of changes made to a Contractor's facility design, operations, or administrative controls. The SRD portion of the authorization basis identifies the standards which the Contractor uses to design, construct and operate the facility and against which the ORP assesses Contractor performance during each stage of the regulatory process. The importance of the authorization basis to these ongoing activities and the need to maintain a credible safety basis for the facility, requires that the authorization basis be maintained.

As a fundamental precept underlying this position paper, the ORP expects the Contractor to be responsible for performing work safely by meeting the provisions of adequate safety, complying with all applicable rules and regulations, and conforming to the top-level standards and principles. The ORP action of Standards Approval included both (1) the approval of the Contractor-recommended set of radiological, nuclear, and process safety standards and requirements, and (2) the approval of the Contractor's integrated safety management processes ensuring safe performance of work. Contractor-initiated changes to both the standards and the integrated safety management program are addressed in this position paper.

The maturation of the Contractor's facility design and activities, and other changing conditions, result in a need to establish a process for the Contractor to make changes to the authorization basis. This process needs to balance the RPP-WTP regulatory principle of efficiency with assurance that adequate safety will not be compromised. The ORP position regarding Contractor-initiated changes was developed to

conform with these program requirements and with the applicable portions of DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*.

## 2.0 DEFINITIONS

Authorization Basis: The composite of information provided by a Contractor in response to radiological, nuclear, and process safety requirements that is the basis on which the ORP grants permission to perform regulated activities. The authorization basis includes that information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by the ORP. Examples of such information include:

1. The information submitted in connection with a request for Standards Approval, a request for Construction Authorization, a request for Operations Authorization, or an Initial Safety Assessment. This includes the information associated with the requests as described in DOE/RL-96-0003, *DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor*, and any other information submitted by the Contractor in connection with the requests.<sup>1</sup>
2. Amendments to the information described above that are on the Contractor docket. Such amendments may be in the form of revisions to previously submitted documents, or new information that supplements previously submitted information.

An authorization basis begins at the Standards Approval regulatory action and continues throughout the design, construction, operation, and decommissioning of the RPP-WTP facility.

Change(s): Change(s) to the facility or to the administrative controls that are described in the authorization basis or relied upon by the Contractor to ensure conformance to the authorization basis.<sup>2</sup>

Facility: As used above in the Change(s) definition, “facility” refers to the physical facility, the hazards and safety analysis of the facility, and the work at the facility that is enveloped by the analyses. The facility is described in the authorization basis by information such as; the site description, design information, hazard analysis information, safety analysis information, and descriptions of facility operations, tests, and experiments. While the SRD contains regulatory information that affects design, it is not part of the definition of “facility” as used in this document.

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<sup>1</sup> Documents submitted to the ORP in connection with a regulatory action may be superseded by documents submitted in subsequent regulatory actions. For example, the Preliminary Safety Analysis Report submitted in a Construction Authorization request may be superseded by a Final Safety analysis Report submitted in an Operations Authorization Request. The Contractor may request that information and commitments made in superseded documents be removed from the authorization basis.

<sup>2</sup> Included within the scope of “change(s)” are those items that are not explicitly described in the authorization basis, but which if modified or deleted, would cause a deviation from commitments contained in the authorization basis.



Administrative Controls: As used above in the Change(s) definition, “administrative controls” refers broadly to the approved management and administrative processes associated with managing, designing, building, or operating the facility. Administrative controls are described in the authorization basis by information such as the descriptions of procedures, programs, plans, and management processes.

Authorization Basis Amendment Request (ABAR): The ABAR is a Contractor-submitted change to the authorization basis submitted to DOE for approval. The ABAR contains a description of the authorization basis change, a reason for the change, an implementation schedule for the change, a copy of the actual page changes, and a copy of the associated safety evaluation.

Authorization Basis Change Notice (ABCN): The ABCN is a Contractor-approved change to the authorization basis submitted to DOE for information. The ABCN contains a brief description of the authorization basis change, the specific reference to the authorization basis documents, including facility documents as necessary, and a summary of the associated safety evaluation. It will not necessarily include the actual authorization basis page changes.

Design Basis Event (DBE): Postulated events providing bounding conditions for establishing the performance requirements of structures, systems and components that are necessary to: (1) ensure the integrity of the safety boundaries protecting the worker; (2) place and maintain the facility in a safe state indefinitely; or (3) prevent or mitigate the event consequences so that the radiological exposures to the general public or the workers would not exceed appropriate limits. The DBEs also establish the performance requirements of the structures, systems and components whose failure under DBE conditions could adversely affect any of the above functions.

Safety Requirements Document (SRD): A document that contains the approved and mandated set of radiological, nuclear, and process safety standards and requirements which, if implemented, provides adequate protection of workers, the public, and the environment against the hazards associated with the operation of the Contractor’s facilities. The SRD was first approved as part of the Standards Approval regulatory action.

Safety Design Class (SDC): Structures, systems, and components (SSCs) that, by performing their specified safety function, prevent workers or the maximally exposed member of the public from receiving a radiological or chemical exposure that exceeds the exposure standards defined in the Safety Requirements Document. Those features credited for the prevention of a criticality event are also designated as SDC. Functional requirements for SDC SSCs are described in Chapter 4 of the safety analysis report as are descriptions of how the SSC meets its respective safety function.

Safety Function: Any function that is necessary to ensure: (1) the integrity of the boundaries retaining the radioactive materials; (2) the capability to place and maintain the facility in a safe state; or (3) the capability to prevent or mitigate the consequences of facility conditions that could result in radiological exposures to the general public or workers in excess of the appropriate limits.

Start of Cold Testing: Refers to that point in the construction phase of each facility of the RPP-WTP

program during start-up testing prior to admitting any significant quantities of radioactive waste or process chemicals into the facility. This milestone will be established in the Construction Authorization Agreement.

Technical Safety Requirement (TSR): Those requirements that define the conditions, the safe boundaries, and the management or administrative controls necessary to ensure the safe operation of the facility, reduce the potential risk to the public and facility workers from uncontrolled releases of radioactive materials, and from radiation exposures due to inadvertent criticality. The TSRs are approved as part of the Production Operations Authorization regulatory action.

### **3.0 POSITION**

3.1 The processes associated with evaluating and implementing Change(s) are, themselves, important-to-safety. Accordingly, Contractor evaluation and implementation of Change(s) shall be accomplished:

- a. By qualified personnel.
- b. In accordance with procedures developed and approved under the Contractor's procedure process.
- c. Under the Contractor's approved Quality Assurance Program (QAP).

3.2 The Contractor may make Change(s) if a review is performed and:<sup>3</sup>

- a. The review demonstrates a proposed Change(s) is consistent with the existing authorization basis; or
- b. The authorization basis is revised prior to implementation of the proposed Change(s); or
- c. The Contractor may authorize Change(s) to the Facility that deviate from the Facility description in the authorization basis if the associated Change(s) are implemented in accordance with a Contractor safety management process that is consistent with Position 3.7.

3.3 Revisions to the authorization basis that involve a change(s) to the QAP shall be accomplished in accordance with the provisions of 10 CFR 830.121 and the QAP that implements the rule.

3.4 Revisions to the authorization basis that involve a change(s) to the Radiation Protection Program shall be accomplished in accordance with the provisions of 10 CFR 835 and the Radiation

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<sup>3</sup> This position is based on the assumption that it is possible for any change to potentially affect the authorization basis. This position should not be used to preclude the contractor from establishing a class of structures, systems, and components or administrative features for which changes do not have the possibility of affecting the authorization basis and, therefore, would not require such a safety evaluation.

Protection Program that implements the rule.

### 3.5 Authorization Basis Revisions

a. The Contractor may make revisions to the authorization basis associated with Change(s) to the Facility without prior ORP approval, provided that the following safety evaluation and documentation requirements are met prior to implementation of the revision.

1. A safety evaluation<sup>4</sup> is performed which demonstrates that the revision:

- i. Does not involve the deletion or modification of a standard previously identified or established in the approved SRD.
- ii. Does not involve the modification of an approved TSR (only after Production Operations Authorization Agreement approval).
- iii. Does not create a new DBE.
- iv. Does not result in more than a minimal increase in the frequency or consequence of an analyzed DBE as described in the Safety Analysis Report.
- v. Does not result in more than a minimal decrease in the Safety Functions of important-to-safety SSCs or change how a SDC SSC meets its respective safety function.
- vi. Will continue to comply with all applicable laws and regulations, conform to top-level safety standards, and provide adequate safety.
- vii. Will continue to conform to the contract requirements associated with the authorization basis document(s) affected by the revision.
- viii. Will not result in inconsistencies with other commitments and descriptions contained in portions of the authorization basis or an authorization agreement not being revised.

2. The following documentation and reporting requirements are met:

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<sup>4</sup> The format, content, and level-of detail associated with an acceptable "safety evaluation" is highly dependent on the nature of the proposed revision to the authorization basis, but in all cases, the safety evaluation must provide the rationale which demonstrates Items 1.i through 1.viii are met. Rather than establishing comprehensive guidance on appropriate safety evaluation format, content, and level-of detail, the position identifies the most fundamental basis that can be applied to evaluating proposed revisions. There is a wide range of acceptable safety evaluation approaches. Also, the appropriate degree of rigor and documentation associated with the safety evaluation should be tailored to the specific authorization basis revision.

- i. All Change(s), authorization basis revisions, and associated safety evaluations performed in conformance with Position 3.5.a.1 shall be documented.<sup>5</sup>
  - ii. Documentation shall be retained and readily available for ORP review.
  - iii. Safety evaluations should be documented in sufficient detail such that a knowledgeable individual reviewing the safety evaluation can identify the technical issues considered during the safety evaluation and basis for the determinations.
  - iv. The ORP shall be notified, by means of an ABCN, of revisions to the authorization basis within 30-days of implementing such revisions. This notification must contain a brief description of the authorization basis change, the specific references to the authorization basis documents, including facility documents, that have been revised and a summary of the safety evaluation. The safety evaluation summary shall include a brief description of the basis for concluding that each of the requirements of Position 3.5.a.1 have been met. DOE may require any changes to be rescinded if it determines, within 60 days of notification, that the change is not consistent with the applicable contractual and regulatory requirements. An ABCN containing the specific authorization basis changes must be submitted by March 30, for changes made during the previous calendar year under Position 3.5.a.
- b. The Contractor may make revisions to the authorization basis associated with Change(s) to the Administrative Controls without prior ORP approval, provided that the following safety evaluation and documentation requirements are met prior to implementation of the revision.
- 1. A safety evaluation<sup>6</sup> is performed which demonstrates that the revision:
    - i. Does not involve the deletion or modification of a standard previously identified or established in the approved SRD.
    - ii. Does not involve the modification of an approved TSR (only after Production Operations Authorization Agreement approval).
    - iii. Will continue to comply with all applicable laws and regulations, conform to top-level safety standards, conform to the requirements of the SRD; and provide adequate safety.

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<sup>5</sup> For Changes made under Position 3.5.a, all documents affected by the Change except for the PSAR , PCAR or LCAR must be revised at the time the Change is implemented. The PSAR , PCAR or LCAR must be revised in accordance with the schedule described in Position 3.5.a.2.iv.

<sup>6</sup> Ibid.

- iv. Will continue to conform to the contract requirements associated with the authorization basis document(s) affected by the revision.
  - v. Will not result in inconsistencies with other commitments and descriptions contained in portions of the authorization basis or an authorization agreement not being revised.
2. The following documentation and reporting requirements are met:
- i. All Change(s), authorization basis revisions, and associated safety evaluations performed in conformance with Position 3.5.b.1 shall be documented.<sup>7</sup>
  - ii. Documentation shall be retained and readily available for ORP review.
  - iii. Safety evaluations should be documented in sufficient detail such that a knowledgeable individual reviewing the safety evaluation can identify the technical issues considered during the safety evaluation and basis for the determinations.
  - iv. The ORP shall be notified, by means of an ABCN, of revisions to the actual authorization basis documents within 30-days of implementing such revisions. This notification must contain a brief description of the authorization basis change, the specific references to the authorization basis documents, including administrative controls documents, that have been revised and a summary of the safety evaluation. The safety evaluation summary shall include a brief description of the basis for concluding that each of the requirements of Position 3.5.b.1 have been met. DOE may require any changes to be rescinded if it determines, within 60 days of notification, that the change is not consistent with the applicable contractual and regulatory requirements. An ABCN containing the specific authorization basis changes must be submitted by March 30, for Changes made during the previous calendar year under Position 3.5.b.
- c. The Contractor may not make revisions to the SRD Safety Criteria or Implementing Codes and Standards without prior ORP approval.

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<sup>7</sup> For Changes made under Position 3.5.b, all documents affected by the Change except for the PSAR , PCAR or LCAR must be revised at the time the Change is implemented. The PSAR , PCAR or LCAR must be revised in accordance with the schedule described in Position 3.5.b.2.iv.

### 3.6 Authorization Basis Amendment Requests (ABAR)

If the Change(s) does not meet the conditions of approval in Position 3.5, ORP approval is required. An authorization basis revision that requires the approval of ORP prior to implementation may be implemented following approval by the ORP of a request to amend the authorization basis. An amendment request, submitted to ORP by means of an ABAR, shall include the following:

- a. A description of the proposed revision.
- b. A reason for the proposed revision.
- c. A description of the proposed implementation schedule for the revision and associated Change(s).
- d. A copy of the authorization basis document or appropriate excerpt showing the proposed revision.
- e. A safety evaluation of the proposed revision as described in Position 3.5.a or 3.5.b as applicable for the type of Change(s).
- f. If the revision involves the deletion or modification of a standard previously identified in the approved SRD, certification that the revised SRD will identify a set of standards that will continue to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards<sup>8</sup>.

### 3.7 Authorization Basis Deviations

Prior to the Start of Cold Testing, for Change(s) to the Facility that deviate from the Facility description in the authorization basis that must be made under the provisions of Position 3.6, the Contractor may make these Changes without prior ORP approval provided that:

- a. The Contractor has performed a safety evaluation and determined the following:
  1. Conformance with applicable laws and regulations, top level standards and principles, and SRD safety criteria is maintained.
  2. The specific Change(s) to be authorized do not cause or threaten imminent danger to the workers, the public, or the environment from radiological, nuclear, or chemical hazards.

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<sup>8</sup> As noted in a preceding footnote, the format, content, and level of detail associated with an acceptable "safety evaluation" is highly dependent on the nature of the proposed revision to the authorization basis. If a proposed SRD Change potentially results in less protection of workers, the public or the environment against the hazards associated with the operation of the facility, the safety evaluation for this Change should follow the process outlined in DOE/RL-96-0003, DOR/RL-96-0004 and DOR/RL-96-0006.

- b. The specific Change(s) that will deviate from the authorization basis have been identified.
  - c. The Contractor's process for implementing the Change(s) is consistent with the documentation and administrative controls described in Position 3.8.
- 3.8 Specific Change(s) identified in Position 3.7.b may be made provided that the following documentation specifications and administrative controls are implemented.
- a. The deviation from the authorization basis shall be clearly documented and approved prior to implementing any associated Change(s). Documentation shall include the following:
    - 1. Identification of the specific Change(s) authorized.
    - 2. A description of the specific deviation from the authorization basis associated with implementing the Change(s).
    - 3. The safety evaluation described in Position 3.7.a.
    - 4. The signature of Contractor manager(s) designated with the authority to approve Change(s) that deviate from the authorization basis and the date such Change(s) were approved.
  - b. All Change(s) implemented under this provision that deviate from the authorization basis shall be specifically documented and tracked as deviations using appropriate quality procedures and documents.
  - c. During the RPP-WTP construction phase, the Contractor shall notify the ORP of each Contractor-approved Deviation from the authorization basis, if resolution of the Deviation will require ORP approval (as determined under Position 3.5.a.):
    - 1. Either verbally or in writing within 24 hours
    - 2. In writing including a copy of the Contractor's approval as documented in Position 3.8.a above, within 72 hours.
  - d. As soon as practical but not later than 30 days following the decision to deviate from the authorization basis (as recorded in Position 3.8.a.4) an ABAR that will resolve the deviation from the authorization basis shall be approved by the Contractor and submitted to the ORP under the provisions of Position 3.6.
  - e. ORP approval of amendment requests submitted per Position 3.8.d.2 shall be obtained within 90 days of the Contractor's approval of Change(s) that deviate from the authorization basis (as recorded in Position 3.8.a.4).

- f. If time limits specified in Position 3.8.d or Position 3.8.e are not met then:
  - 1. All physical work associated with implementing the authorized Change(s) (as documented in Position 3.8.a.1) shall stop.
  - 2. Corrective action shall be immediately taken to promptly correct the deviations documented under Position 3.8.b.
- g. The Contractor's processes and records for implementing Change(s) that deviate from the authorization basis shall be auditable and readily accessible. Specifically:
  - 1. Documentation related to the approval of deviations from the authorization basis and associated Change(s) shall be readily retrievable by the Contractor and made available upon request to the ORP for inspection.
  - 2. A current status report of deviations from the authorization basis, related Change(s), and related Contractor documents shall be readily available upon request to the ORP for inspection.
- h. All revisions to the authorization basis associated with authorization basis deviations shall be completed, documented under Position 3.8.b., and resolved prior to Start of Cold-Testing.

## 4.0 REFERENCES

10 CFR 830 Subpart A, "Quality Assurance Requirements," *Code of Federal Regulations*, as amended.

10 CFR 835, "Occupational Radiation Protection," *Code of Federal Regulations*, as amended.

DOE/RL-96-0003, *DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor*, U.S. Department of Energy, Office of River Protection, 2001.

DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*, U.S. Department of Energy, Office of River Protection, 2001.

*Integrated Safety Management Plan*, 24590-WTP-ISMP-ESH-01-001, Bechtel National, Inc., 2002.

*Safety Requirements Document*, 24590-WTP-SRD-ESH-01-001-02, Bechtel National, Inc., 2002.



## **5.0 LIST OF TERMS**

ABAR	Authorization Basis Amendment Request
ABCN	Authorization Basis Change Notice
DBE	Design Basis Event
DOE	U.S. Department of Energy
ORP	Office of River Protection
QAP	Quality Assurance Program
RPP-WTP	River Protection Project-Waste Treatment Plant
SDC	Safety Design Class
SRD	Safety Requirements Document
SSC	systems, structures and components
TSR	Technical Safety Requirements